



Andrew Perrong <a@perronglaw.com>

Cunningham v. Wallace & Graham

3 messages

Leerberg, Matt <MLeerberg@foxrothschild.com>

Fri, Apr 5, 2024 at 9:19 AM

To: "ryan@ryanpduffy.com" <ryan@ryanpduffy.com>, "a@perronglaw.com" <a@perronglaw.com>

Counsel,

I've just been retained to represent Defendants in this action, pending in the MDNC. I will be moving for a 21-day extension of time for Defendants to respond to the complaint. That will take the due date to April 29, 2024, even for Defendants who were served later or not yet served. May I represent your consent?

Best,

Matt



Matthew Nis Leerberg

Co-Chair, Fox's National Appellate Team

North Carolina Board Certified Specialist in Appellate Practice

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Blog: Appellate Practice Blog

EXHIBIT B

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Andrew Perrong <a@perronglaw.com>
To: "Leerberg, Matt" <MLeerberg@foxrothschild.com>
Cc: "ryan@ryanpduffy.com" <ryan@ryanpduffy.com>

Fri, Apr 5, 2024 at 10:09 AM

Mr. Leerberg,

We have no objection to the extension.

However, am I correct in understanding that you represent all defendants, including the individual defendants?

If so, we would condition any extension on waiving service as to any remaining defendants which have not yet been formally served. If this is acceptable, please advise and I will send you over waivers.

--

Thank you kindly,
Andrew Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, PA 19038
215-225-5529 (CALL-LAW)

[Quoted text hidden]

Leerberg, Matt <MLeerberg@foxrothschild.com>
To: Andrew Perrong <a@perronglaw.com>
Cc: "ryan@ryanpduffy.com" <ryan@ryanpduffy.com>

Fri, Apr 5, 2024 at 10:25 AM

Thanks for the quick reply.

Yes, I represent all defendants.

I don't anticipate that accepting service will be an issue, but I am not authorized to accept service yet. And I need to get the motion on file this morning. Against that backdrop, may I still represent your consent? After I get the motion on file, I will seek authorization from my clients to accept service and then will revert to you promptly.

[Quoted text hidden]

[Redacted signature]

On Fri, Apr 5, 2024 at 9:19 AM Leerberg, Matt <MLeerberg@foxrothschild.com> wrote:

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[Redacted]

[Redacted]

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